



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JUL 11 2013

Mr. Glen Schwartz
Mile Rail, LLC
8116 Wilson Road
Kansas City, Missouri 64125

RE: Comments on the July 2, 2013, Revised Removal Action Plan for the
Former GST Steel Facility Site

Dear Mr. Schwartz:

The United States Environmental Protection Agency has reviewed the subject document and is providing the following comment to be incorporated in a revised Removal Action Plan.

1. Section 4.1.2: The first sentence of the second paragraph should be edited to indicate that the backfill soil in Excavations 1, 3, and 4 can be disposed of as special waste in a non-hazardous waste landfill, and the backfill soil in excavation 2 will be disposed of as TSCA regulated waste at a TSCA-approved chemical disposal facility. As indicated in the EPA's previous comments, the discrete soil samples collected from backfill in excavation 2 were inconsistent with the earlier composite sample result, and failed to identify an area of PCB soil contamination attributable to the composite soil sample result of 27 mg/kg. Therefore, the backfill soil in excavation 2 will need to be disposed of as TSCA regulated waste at a TSCA-approved chemical disposal facility.

I can be reached at (913) 551-7755 if you have any questions concerning this comment.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Morrison".

Bruce Morrison
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Mark L. Finney, CB&I
William Spratlin, CB&I



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